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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

RICHARD WALKER,

Petitioner,

vs.

DWIGHT NEVEN, *et al.*,

Respondents.

Case No. 2:13-cv-01099-APG-VCF

**UNOPPOSED MOTION FOR  
ENLARGEMENT OF TIME  
TO FILE RESPONSE IN SUPPORT OF  
ANSWER TO GROUND B OF WALKER'S  
AMENDED PETITION FOR WRIT OF  
HABEAS CORPUS  
(ECF NO. 143)  
(FIRST REQUEST)**

Respondents move this Court for an enlargement of time of 45 days from the current due date of April 2, 2021, in which to file a Response to Walker's Reply (ECF No. 143). This Motion is made pursuant to FED. R. CIV. P. 6(b) and Rule 6-1 of the Local Rules of Practice and is based upon the attached declaration of counsel.

This is the first enlargement of time sought by Respondents and is brought in good faith and not for the purpose of delay.

DATED March 30, 2021.

Submitted by:

AARON D. FORD  
Attorney General

By: /s/ Katrina A. Samuels  
Katrina A. Samuels (Bar. No. 13394)  
Deputy Attorney General

## **DECLARATION OF KATRINA SAMUELS**

STATE OF NEVADA )  
COUNTY OF CLARK ) ss:

I, Katrina A. Samuels, being first duly sworn under oath, depose and state as follows:

1. I am an attorney licensed to practice law in all courts within the State of Nevada and am employed as a Deputy Attorney General in the Office of the Nevada Attorney General. I have been recently assigned to represent Respondents in *Richard Walker v. Dwight Neven, et al.*, Case No. 2:13-cv-01099-APG-VCF, and as such, have personal knowledge of the matters contained herein.

2. This motion is made in good faith and not for the purpose of delay.

3. The Response to Walker's Reply is currently due on Friday, April 2, 2021.

4. I have been unable with due diligence to timely complete the Response.

5. In light of the global pandemic caused by COVID-19, our office has transitioned to a work-from-home model that continues to the present and as a result, Respondents are still experiencing varying network connectivity issues. In addition, Respondents have other responses with deadlines that were already in place before Respondents were ordered to Respond to Walker's remaining claim. Due to varying levels of network access and instantaneous deadlines, I request a 45-day enlargement of time, up to and including May 17, 2021, to file our Response.

6. I communicated with counsel for Walker regarding this extension and she does not object to this request.

7. Based on the foregoing, I respectfully request an enlargement of time of 45 days from the current due date, up to and including May 17, 2021, to file the Response to Walker's Reply.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 30<sup>th</sup> day of March 2021.

/s/ Katrina A. Samuels

Katrina A. Samuels (Bar No. 13394)  
Deputy Attorney General

IT IS SO ORDERED:

Dated: March 31, 202

ANDREW P. GORDON  
UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing *Unopposed Motion for Enlargement of Time to File Response in Support of Answer to Ground B of Walker's Amended Petition for Writ Of Habeas Corpus (ECF No. 143) (First Request)* with the Clerk of the Court by using the CM/ECF system on March 30, 2021.

The following participants in this case are registered CM/ECF users and will be served by the CM/ECF system:

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/s/ M. Landreth  
An employee of the Office of the Attorney General